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May 5, 2006

VIA HAND DELIVERY

Charles L.A. Terreni, Esquire
Chief Clerk and Administrator
PSC
101 Executive Center Drive
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COLUMBIA, SC

RE: Intrastate Universal Service Docket No. 97-239-C

Dear Mr. Terreni:

Enclosed please find the original and ten (10) copies of the following for filing:

1. Response of United Telephone Company of the Carolinas to the SCCTA's Petition to Raise Additional Issues; and
2. Response of United Telephone Company of the Carolinas to the ORS' Petition for an Order Clarifying USF Guidelines and Request for Expedited Relief.

Also enclosed is the original and a copy the Certificate of Service for both pleadings. Please return a clocked copy of the enclosed responses and certificate of service with my courier. If you or counsel for the parties have questions, please do not hesitate to contact me.

Sincerely,

ELLIOTT & ELLIOTT, PA



Scott Elliott

SE/jcl

Enclosures

c: Parties of Record
Cheryl W. Sweitzer
H. Edward Phillips, Esquire

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

IN RE:

**INTRASTATE UNIVERSAL SERVICE
FUND**

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DOCKET NO. 1997-239-C

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COLUMBIA, SC

**RESPONSE OF UNITED TELEPHONE COMPANY OF THE CAROLINAS TO
THE SCCTA'S PETITION TO RAISE ADDITIONAL ISSUES**

INTRODUCTION

Pursuant to the Notice of April 13, 2006 issued by the Public Service Commission of South Carolina (the "Commission") and 26 S.C. Regs., 103-837 and 103-841, United Telephone Company of the Carolinas ("United") responds to the petition filed by the South Carolina Cable Television Association ("SCCTA") on April 5, 2006.



JURISDICTION

United agrees that the Commission has jurisdiction over this matter under S.C. Code Ann. § 58-9-280 (Supp. 2004). In addition, United also agrees with the ORS' Motion at Paragraph 5, p.3 that the ORS' Petition for Clarification and the SCCTA's Petition can be dealt with in different phases of this proceeding.

UNITED'S RESPONSE TO THE SCCTA

Without waiving any legal positions that United may pursue in a proceeding that may determine whether it is appropriate to include wireless revenues in the State USF assessment, or whether it is appropriate for carriers of last resort to receive USF support for access lines that are sold as a part of a bundle services, United responds as follows to the SCCTA:

1. The Commission may wish to consider the petition filed by the SCCTA on April 5, 2006 in a separate contested case proceeding;
2. Specifically, under S.C. Code Ann. § 58-9-280(E)(3) (Supp. 2004) the Commission may consider whether it is appropriate to include wireless revenues in the assessment of the State USF;
3. In considering the SCCTA's petition, the Commission should conduct a hearing and take evidence so it can develop a sufficient record to determine how to resolve SCCTA's concerns under the applicable law; and
4. As the SCCTA has already agreed to, according to the ORS in its April 19th Motion for Expedited Review, the issues the SCCTA has raised in its petition should be bifurcated and considered in a different phase of this proceeding.

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CONCLUSION

Wherefore, based on the foregoing, United Telephone Company of the Carolinas respectfully requests the Commission consider the petition filed by the South Carolina Cable Television Association as discussed herein in a separate phase of this proceeding so that the Office of Regulatory Staff's request is granted in an expedited and timely manner and for such other relief as is just and proper.



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Attorneys for United Telephone Company
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Columbia, SC

May 5, 2006

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the Response of United Telephone Company of the Carolinas to the SCCTA's Petition to Raise Additional Issues and Response of United Telephone Company of the Carolinas to the ORS' Petition for an Order Clarifying USF Guidelines and Request for Expedited Relief on all below listed parties by depositing a copy thereof properly addressed in the United States Mail, first-class postage prepaid.

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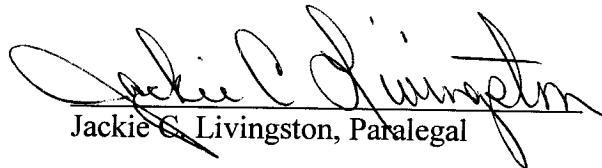
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May 5, 2006


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